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14 Attorneys for Defendant
15 NANCY BLACK

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION

18 UNITED STATES OF AMERICA,) No. CR 12-0002 EJD
19)
20 Plaintiff,) STIPULATION AND PROPOSED ORDER
21 v.) CONTINUING HEARING AND EXCLUDING
22 NANCY BLACK,) AND EXTENDING TIME
23 Defendant.)
24)
25)
26)
27)
28)
29)
30)

31 A further status hearing is set in this case for August 6, 2012 at 1:30 p.m., with Defendant
32 Black's appearance being waived. By email dated July 26, 2012, the Court notified the parties that if
33 any matter scheduled for hearing that date could be continued to a later date the Court would consider a
34 stipulation and proposed order to that effect if submitted to the Court by August 2, 2012. The parties
35 believe that such a continuance would be appropriate in light of their ongoing discussions regarding this
36 case.

37 Based on the foregoing, THE PARTIES STIPULATE AND REQUEST that the hearing
38 currently set for August 6, 2012 be continued to August 20, 2012.

39 THE PARTIES FURTHER STIPULATE AND REQUEST that the Court find that the ends of
40 justice are served by excluding the time from August 6, 2012 to August 20, 2012 from computation

1 under the Speedy Trial Act because the failure to exclude time would unreasonably deny counsel for
2 Defendant the reasonable time necessary for effective preparation of counsel, taking into account the
3 exercise of due diligence, and the ends of justice served by excluding the above time outweigh the best
4 interests of the public and the Defendant in a speedy trial under 18 U.S.C. § 3161(h)(7).

5 IT IS SO STIPULATED.

6 Dated: July 31, 2012

Melinda Haag
United States Attorney

7
8 /S/ _____
9 Christopher L. Hale
10 Jeffrey B. Schenk
Assistant United States Attorneys

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12 Dated: July 31, 2012

13 /S/ _____
14 Mark R. Vermeulen
Lawrence E. Biegel
Attorneys for Defendant
15 NANCY BLACK

16
17 **ORDER**

18 Based on the foregoing stipulation, and good cause appearing,

19 IT IS HEREBY ORDERED that the hearing currently set for August 6, 2012 shall be continued
20 to August 20, 2012.

21 IT IS FURTHER ORDERED that the Court finds that the ends of justice are served by excluding
22 the time from August 6, 2012 to August 20, 2012 from computation under the Speedy Trial Act because
23 the failure to exclude time would unreasonably deny counsel for Defendant the reasonable time
24 necessary for effective preparation of counsel, taking into account the exercise of due diligence, and the
25 ends of justice served by excluding the above time outweigh the best interests of the public and the
Defendant in a speedy trial under 18 U.S.C. § 3161(h)(7).

26 IT IS SO ORDERED.

27
28 Dated: August 1, 2012

29 
Edward J. Davila
United States District Judge